

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP INC.
SECURITIES LITIGATION

No. 07 Civ. 9901 (SHS)

ECF Case

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR (I) PRELIMINARY
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT
CLASS FOR PURPOSES OF THE SETTLEMENT AND (III) APPROVAL
OF NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ira M. Press, dated August 29, 2012, the exhibits attached thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings had herein, Interim Lead Plaintiffs Jonathan Butler, M. David Diamond, David K. Whitcomb and Henrietta C. Whitcomb, Named Plaintiffs John A. Baden III, Warren Pinchuck, Anthony Sedutto, Edward Claus, Carol Weil, and Joseph DiBenedetto, and Additional Proposed Named Plaintiffs the Tennessee Consolidated Retirement Systems and the Public Employees' Retirement Association of Colorado (collectively, the "Plaintiffs") will move this Court, before the Honorable Sidney H. Stein, United States District Judge, in Courtroom 23A, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and at a time designated by the Court, for an Order: (1) granting preliminary approval of the proposed Settlement; (2) conditionally certifying a class for purposes of settlement (the "Settlement Class"); (3) appointing Interim Lead Counsel as Lead Class Counsel; (4) approving the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (5) directing that notice be given to the Settlement Class members; and (6) scheduling a hearing at which time the Court will consider

(a) the Parties' request for final approval of the Settlement Class, the Settlement, the Plan of Allocation and entry of the Final Judgment and Order of Dismissal With Prejudice and (b) Lead Class Counsel's application for an award of attorneys' fees and reimbursement of expenses; and (7) granting such other and further relief as the Court deems just and proper.

Defendants do not oppose this motion.

Dated: August 29, 2012

Respectfully Submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
Ira M. Press
Peter S. Linden
Andrew M. McNeela
825 Third Avenue, 16th Floor
New York, NY 10022
Tel: (212) 371-6600
Fax: (212) 751-2540

Interim Lead Counsel for Plaintiffs